

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CAPPSEALS, INC.,)	
)	
Plaintiff,)	
)	
v.)	
)	
DIRECT MARKETING CONCEPTS, INC.,)	CIVIL ACTION NO. 05-11907-JLT
ITV DIRECT, INC., DIRECT)	
FULFILLMENT, LLC, DONALD)	
BARRETT, and ROBERT MAIHOS,)	
)	
Defendants.)	
)	
)	
)	

**CAPPSEALS, INC.’S MOTION FOR LEAVE TO SUBMIT A REPLY
MEMORANDUM IN FURTHER SUPPORT OF ITS MOTION
FOR PARTIAL SUMMARY JUDGMENT**

Plaintiff Cappseals, Inc. (hereinafter “Cappseals”) respectfully moves this Court for leave to file a Reply Memorandum, submitted herewith, in further support of Cappseals’ Motion for Partial Summary Judgment. Specifically, Cappseals states that certain key issues raised by DMC’s Opposition warrant clarification. Cappseals also asserts that the narrow issues addressed within its Reply Memorandum will assist the Court in analyzing the requested relief.

WHEREFORE, Cappseals requests that the Court grant it leave to file the Reply Memorandum submitted herewith.

Respectfully submitted,
CAPPSEALS, INC.
By its attorneys,

/s/ Peter Antonelli

Daniel J. Kelly BBO# 553926

dkelly@ghlaw.com

Scott A. Silverman, BBO #638087

ssilverman@ghlaw.com

Peter Antonelli BBO # 661526

pantonelli@ghlaw.com

Gadsby Hannah LLP

225 Franklin Street

Boston, MA 02110

(617) 345-7000

DATED: December 13, 2005

LOCAL RULE 7.1 CERTIFICATION

I, Peter Antonelli, counsel for moving party Cappseals, Inc., hereby certify that I have conferred with the defendant's counsel in a good faith attempt to resolve or narrow the issues raised in this motion, but have been unable to do so.

/s/ Peter Antonelli

Peter Antonelli

CERTIFICATE OF SERVICE

I hereby certify that true and accurate copies of the foregoing *Cappseals, Inc.'s Motion for Leave to Reply* were served on the foregoing attorneys of record pursuant to Fed. R. Civ. P. 5 as follows:

Via electronic notification:

Peter S. Brooks pbrooks@seyfarth.com

Susan W. Gelwick sgelwick@seyfarth.com

Christopher F. Robertson crobertson@seyfarth.com

/s/ Peter Antonelli

Daniel J. Kelly BBO# 553926

dkelly@ghlaw.com

Scott A. Silverman, BBO #638087

ssilverman@ghlaw.com

Peter Antonelli, BBO # 661526

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